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SARA KYLE, COMMISSIONER
TN PUBLIC SERVICE COMM.



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City of Chattanooga

REGULATORY AUTHORITY
DOCKET ROOM

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March 28, 2003

Ms. Sara Kyle, Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243

**RE: *Petition of Tennessee American Water Company to
Change and Increase Certain Rates and Charges so as
to Permit it to Earn a Fair and Adequate Rate of
Return on its Property used and Useful in Furnishing
Water Service to its Customers, Docket No. 03-00118.***

Dear Chairman Kyle:

Enclosed for filing is the original and 13 copies of the First Interrogatories and Request for Production of Documents to Petitioner by Intervenor City of Chattanooga.

Should you have any questions, please contact me.

Sincerely

Michael A. McMahan
Special Counsel

MAM/add

Enclosures

cc: Certificate of Service List

BEFORE THE TENNESSEE REGULATORY AUTHORITY

NASHVILLE, TENNESSEE

March 26, 2003

IN RE:)	DOCKET NO.
)	03-00118
PETITION OF TENNESSEE-AMERICAN)	
WATER COMPANY TO CHANGE AND)	
INCREASE CERTAIN RATES AND)	
CHARGES SO AS TO PERMIT IT TO)	
EARN A FAIR AND ADEQUATE RATE)	
OF RETURN ON ITS PROPERTY USED)	
AND USEFUL IN FURNISHING WATER)	
SERVICE TO ITS CUSTOMERS)	

FIRST INTERROGATORIES AND REQUEST FOR PRODUCTION
OF DOCUMENTS TO PETITIONER BY INTERVENOR
CITY OF CHATTANOOGA

TO: Tennessee-American Water Company
c/o Dales Grimes, Esquire and
George H. Masterson, Esquire
Bass, Berry and Sims, PLC
315 Deaderick Street
AmSouth Center Suite #2700
Nashville, Tennessee 37238-3001

Comes now the Intervenor, City of Chattanooga, Tennessee, pursuant to Rule 1220-1-2-.11 of the *Rules of Tennessee Regulatory Authority*, and propounds the following Interrogatories and Request for Production of Documents to Petitioner Tennessee-American Water Company.

1.) What data, records, or information from any source, if any, was used to determine the relative quantity of consumption of water through fire hydrants for fire protection services by the City of Chattanooga?

ANSWER:

2.) What is the source of the "fire demand waiting" factor and "fire demand cost" factor utilized in the development of the proposed tariff for the public fire protection classification?

ANSWER:

3.) What factors are utilized to distinguish the alleged increase in cost associated with pumping facilities or storage facilities for fire protection from the cost that would normally be incurred to design and construct such facilities, absent the need for public fire hydrants?

ANSWER:

4.) What other cities in the American Waterworks System utilize a tariff for public fire protection based upon a cost of services study?

ANSWER:

5.) What factors are utilized in formulating the "extra capacity costs" associated with fire protection?

ANSWER:

6.) Why is the proposed increase for 43.9% for public fire protection so much higher than any other proposed increase?

ANSWER:

7.) What factors are used to justify the maximum hour ratio of 1.80 for fire protection?

ANSWER:

8.) What authoritative books, treatises, or other sources of information did your witnesses rely upon for the increase in tariff for public fire hydrants that is proposed?

ANSWER:

TENNESSEE-AMERICAN WATER COMPANY

By: _____

STATE OF TENNESSEE)
COUNTY OF HAMILTON)

Sworn to and subscribed before me this _____ day of _____, 2003.

NOTARY PUBLIC AT LARGE

My Commission Expires: _____

REQUEST FOR PRODUCTION OF DOCUMENTS

Please produce the following:

- 1.) Any documents relevant to your response to Interrogatory No. 1.
- 2.) Any documents relevant to your response to Interrogatory No. 2.
- 3.) Any documents relevant to your response to Interrogatory No. 3.
- 4.) Any documents relevant to your response to Interrogatory No. 4.
- 5.) Any documents relevant to your response to Interrogatory No. 5.
- 6.) Any documents relevant to your response to Interrogatory No. 6.
- 7.) Any documents relevant to your response to Interrogatory No. 7.
- 8.) Any documents relevant to your response to Interrogatory No. 8.

Respectfully submitted,

CITY OF CHATTANOOGA, TENNESSEE
RANDALL L. NELSON, CITY ATTORNEY

BY: 

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Chattanooga, Tennessee 37402
(423) 757-5338
(423) 756-0737 fax

CERTIFICATE OF SERVICE

This is to certify that I have this day served a true and correct copy of the above and foregoing pleading upon counsel of record by depositing a copy of same in the United States mail with adequate postage affixed thereto, addressed as follows:

Dale Grimes, Esquire
George H. Masterson, Esquire
BASS, BERRY and SIMS, PLC
315 Deaderick Street
AmSouth Center Suite #2700
Nashville, TN 37238-3001

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Nashville, TN 37219

David C. Higney, Esquire
GRANT, KONVALINKA & HARRISON, P.C.
633 Chestnut Street, 9th Floor
Chattanooga, TN 37450

This 26th day of March, 2003.


MICHAEL A. McMAHAN